

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MACNEIL AUTOMOTIVE PRODUCTS  
LIMITED, an Illinois Corporation,

Plaintiff,

V.

CANNON AUTOMOTIVE LIMITED, f/k/a  
CANNON RUBBER LIMITED,  
AUTOMOTIVE DIVISION,  
a United Kingdom Company,

Defendant.

No. 08 C 139

Honorable Joan B. Gottschall

## Magistrate Judge Arlander Keys

## NOTICE OF MOTION

**TO:** Robert S. Grabemann  
Timothy M. Schaum  
Daspin & Aument  
227 West Monroe Street  
Suite 3500  
Chicago, IL 60601  
(312) 258-1600  
Fax: (312) 258-1955  
[rgrabemann@daspinaument.com](mailto:rgrabemann@daspinaument.com)

PLEASE TAKE NOTICE that on Thursday, April 10, 2008 at 9:30 a.m. or as soon thereafter as counsel may be heard, the undersigned shall appear before the Honorable Joan B. Gottschall, or whomever may be sitting her stead, in Courtroom 2325, of the Dirksen Federal Building, 219 S. Dearborn Street, Chicago, Illinois, and then and there present the attached **Cannon's Motion to Withdraw Motion to Dismiss or Stay Based on the *Colorado River* Doctrine and to Readjust the Date for Cannon to Answer or Otherwise Respond to the Complaint.**

Respectfully submitted,

CANNON AUTOMOTIVE LIMITED

By: /s/ Terrence J. Sheahan  
One Of Its Attorneys

William N. Howard  
John T. Shapiro  
Terrence J. Sheahan  
Freeborn & Peters LLP  
311 South Wacker Drive, Suite 3000  
Chicago, Illinois 60606  
(312) 360-6000

Dated: April 2, 2008

**CERTIFICATE OF SERVICE**

The undersigned, being one of the attorneys of record in the above cause, certifies that he this day caused a copy of **Cannon's Motion to Withdraw Motion to Dismiss or Stay Based on the *Colorado River Doctrine* and to Readjust the Date for Cannon to Answer or Otherwise Respond to the Complaint**, to be served upon the attorneys listed below via the Northern District of Illinois, Eastern Division, ECF filing system, and as otherwise noted, prior to 5:00 p.m. on this 2nd day of April, 2008.

**TO:** Robert S. Grabemann  
Timothy M. Schaum  
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/s/ Terrence J. Sheahan  
Terrence J. Sheahan